

EXHIBIT 3

Sarah A. Ramsey

Subject: FW: Smith: Wiley Deposition

From: Adam Engel [<mailto:aengel@meclaw.net>]
Sent: Tuesday, January 08, 2019 3:51 PM
To: Gerard Pignato PCL <jerry@rkcglaw.com>; Greg Andrews <greg@andrews.law>
Subject: RE: Smith: Wiley Deposition

Jerry – You should know that our firm intends on calling Mr. Battles at trial. He is on our final witness list. It sounds like this will likely become a subject of at least one pretrial motion. Regardless of what happens down the road, I want you to know you have opportunity to take his deposition after today. If you desire to do so, feel free to provide me with dates.

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